

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

GERARD LAFFAN, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

SANTANDER BANK, N.A., et al.

Defendants.

Civil Action No. 5:13-CV-04040-JLS

JOINT STATUS REPORT AND NOTICE OF SETTLEMENT AND PROPOSED ORDER

Plaintiff Gerard Laffan, and Defendants Santander Bank, N.A., American Modern Insurance Group, Inc. (“AMIG”), and Atlas Insurance Agency, Inc. (“Atlas”) (collectively, the “Parties”), hereby report to the Court regarding the outcome of the April 24, 2015 mediation:

1. After a full day mediation session with Jonathan Marks of MarksADR, LLC in Washington, D.C., the Parties agreed to the terms of a settlement in principle, and are currently working to prepare a comprehensive settlement agreement and related settlement documents.
2. The Parties intend to file a motion for preliminary approval of the settlement on or before June 10, 2015.
3. In light of the settlement, the Parties respectfully request that the Court continue the stay pending approval of the settlement by the Court.

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CERTIFICATE OF SERVICE

I hereby certify that on May 1, 2015, a true and correct copy of the foregoing document was electronically filed with the Clerk of the Court, is available for viewing and downloading from the ECF system, and will be served by operation of the Court's electronic filing system (CM/ECF) upon all counsel of record.

s/ Peter A. Muhic

Peter A. Muhic (PA 73501)